

*Felony***UNITED STATES DISTRICT COURT**SOUTHERN DISTRICT OF TEXAS
UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT*B-08-327-MJ*

- 1- Jessica Ann VASQUEZ
YOB: 1984
2. Jennifer CASTRO
YOB: 1985
- 3 Vanessa Marie GARZA
YOB: 1985
4. Esequiel GOMEZ
YOB: 1985

CASE NUMBER:

I, Marian Kupczynski, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. Between September 2007 and January 2008 in Cameron County, in the Southern District of Texas, defendant(s) did,

Acquired firearms or/and ammunition from a licensed importer, licensed dealer, or licensed collector, and did knowingly make false or fictitious oral or written statements and furnished or exhibited any false, fictitious, or misrepresented identification, intended or likely to deceive such importer, manufacturer, dealer, or collector with respect to any fact material to the lawfulness of the sale or other disposition of such firearm or ammunition which had been shipped or transported in interstate and foreign commerce.
in violation of Title 18 United States Code, Section 922(a)(6).

Knowingly made any false statement or representation with respect to the information required to be kept in the records of a licensed Federal Firearms Licensed dealer.

In violation of Title 18 United States Code, Section 924(a)(1)(a).

Unlawful for two or more persons to conspire either to commit any offense against the United States, or any Agency thereof in any manner or for any purpose.

In violation of Title 18 United States Code, Section 371.


Whoever with intent to commit therewith an offense punishable by imprisonment for a term exceeding one year, or with knowledge or reasonable cause to believe that an offense punishable by imprisonment for a term exceeding one year is to be committed therewith, ships transports, or receives a firearm or ammunition in interstate or foreign commerce.

In violation of Title 18 United States Code, Section 924(b)

I further state the I am a Special Agent with the Bureau of Alcohol, Tobacco and Firearms and that this complaint is based on the following facts:

SEE ATTACHMENT A

Continued on the attached sheet and made a part hereof: ☒ YES ☐ NO


 Signature of Complainant

Sworn to before me and subscribed in my presence,

April 1, 2008

Date

AT

Brownsville, Texas

City and State

Felix Recio, United States Magistrate Judge

Name and Title of Judicial Officer



Signature of Judicial Officer

B-08-327-MJ

Attachment A

Jessica Ann VASQUEZ

YOB: 1984

Jennifer CASTRO

YOB: 1985

Vanessa Marie GARZA

YOB: 1985

Eseguiel GOMEZ

YOB: 1985

1. Your affiant reviewed and ATF form 4473 depicting Jennifer CASTRO as purchasing firearms. The following information was observed.

<u>Manufacturer</u>	<u>Model</u>	<u>Serial Number</u>	<u>Type</u>	<u>Cal.</u>	<u>Purch place</u>
Colt	1911	2821094	Pistol	.38	Guns N Goods
Colt	1911	2821089	Pistol	.38	Guns N Goods

Approx. Total Amount \$2400.00

2. Your affiant interviewed Jennifer CASTRO in reference the aforementioned purchased firearms. Jennifer CASTRO provided a sworn affidavit confessing to purchasing the firearms for Eseguiel GOMEZ at his direction. That at the time she purchased the firearms, she also confessed to not residing at the address she provided on the ATF Form 4473.
3. Your affiant reviewed an ATF form 4473 depicting Vanessa GARZA as purchasing several firearms. The following information was observed:

<u>Man</u>	<u>Model</u>	<u>Serial Number</u>	<u>Type</u>	<u>Caliber</u>	<u>Purch Loc.</u>
Colt	1911	2821720	Pistol	.38	Guns N Goods
Colt	1911	2821721	Pistol	.38	Guns N Goods

Approx. Total Amount \$1600.00

4. ATF interviewed Vanessa GARZA in reference the aforementioned purchased firearms. Vanessa GARZA provided a sworn affidavit confessing to purchasing the firearms for Eseguiel GOMEZ at his direction.
5. Your affiant reviewed and ATF Form 4473 depicting Jessica VASQUEZ as purchasing two firearms. The following information was observed:

<u>Manufacturer</u>	<u>Model</u>	<u>Serial Number</u>	<u>Type</u>	<u>Caliber</u>
Colt	1911	2821515	Pistol	.38
Colt	1911	CV04656E	Pistol	.38

Approximate Total Amount \$1600.00.

B-08-327-MJ

6. ATF interviewed Jessica VASQUEZ in reference the aforementioned purchased firearms. Jessica VASQUEZ provided a sworn affidavit confessing to purchasing the firearms for Eseguiel GOMEZ at his direction.
7. Your affiant interviewed Eseguiel GOMEZ in reference his knowledge of firearms trafficking. Eseguiel GOMEZ provided an affidavit confessing to committing and directing firearm trafficking. The following information was obtained:

That he met a person Named Mauricio at a club called Jazz in Matamoros Mexico.

That Mauricio offered him money to purchase firearms.

That Mauricio would pay him \$200.00 a firearm in addition to paying the persons who purchased the firearms \$150.00 for each firearm.

That he agreed to obtain firearms for Mauricio.

That Mauricio would come to his residence at [REDACTED], give him the money for the firearms and specify which one he wanted.

That he recruited Jenifer CASTRO, Jessica VASQUEZ and Vanessa GARZA to purchase the firearms for him.

That he could not purchase any firearms for Mauricio because he is currently on deferred adjudication for trafficking 25 lbs of marijuana.

That he would contact Jenifer CASTRO, Jessica VASQUEZ and Vanessa GARZA to come to his house to receive money and instructions as to which firearm to purchase.

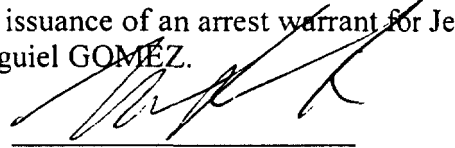
That they would then go to the gun shop, purchase the firearm, and return to his residence with the firearm, receipts and any change.

That Mauricio LNU would contact him to determine if the firearms were obtained and then come to his (GOMEZ's) residence to pick them up.

That he knew the firearms were going to Mexico because Mauricio told him.

B-08-327-MJ

8. To the best of my knowledge and belief, all statements made in this attachment are true and correct. Based on the foregoing facts, I believe probable cause exists for the issuance of an arrest warrant for Jessica VASQUEZ, Jennifer CASTRO, Vanessa GARZA and Eseguiel GOMEZ.


Marian Kupczynski
Special Agent, ATF

Sworn to and subscribed before me this 1st day of April, 2008,
at Brownsville, Texas.


Felix Recio
United States Magistrate Judge